

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re: ) Chapter 11  
)  
W. R. GRACE & CO., et al.,<sup>1</sup> ) Case No. 01-01139 (JKF)  
) Jointly Administered  
Debtors. )

Hearing Date: April 25, 2005 at 12:00 noon EST  
Response Deadline: March 18, 2005

**NOTICE OF FILING DEBTORS' OBJECTION TO  
UNITED STEELWORKERS OF AMERICA CLAIM NO. 13283 (SUBSTANTIVE)**

PLEASE TAKE NOTICE that on February 11, 2005, the above-captioned debtors and debtors in possession (the "Debtors") filed the Debtors' Objection to United Steelworkers of America Claim No. 13283 (the "Claim Objection") with the United States Bankruptcy Court for the District of Delaware.

**PLEASE TAKE FURTHER NOTICE that**

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<sup>1</sup> The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

1. A hearing on the Claim Objection will be held before the Honorable Judith K. Fitzgerald, United States Bankruptcy Court, 824 Market Street, Wilmington, Delaware on **April 25, 2005 at 12:00 p.m.** (the "Hearing").

2. Any party wishing to oppose the relief requested in the Claim Objection must file a written response with the Clerk of the U.S. Bankruptcy Court, 824 Market Street, Wilmington, Delaware 19801, and serve a copy of the response upon Kirkland & Ellis LLP, Attn: Rachel R. Schulman, 200 East Randolph Drive, Suite 6500, Chicago, Illinois 60601, and upon Pachulski, Stang, Ziehl, Young, Jones & Weintraub P.C., Attn: David W. Carickhoff, Jr., 919 N. Market Street, 16th Floor, P.O. Box 8705, Wilmington, Delaware 19899-8705 (Courier 19801), so as to be received on or before March 18, 2005. Only those responses timely filed with the Court and received by the Debtors' counsel will be considered by the Court.

3. If no response is filed, served and received by March 18, 2005, the Court will be requested to enter an order, similar to the attached form of proposed order disallowing and expunging the Claim as requested in the Claim Objection.

4. Any response should contain the following:

- a. a caption setting forth the name of the Court, the name of the Debtors, the case number and the title of the Claim Objection to which the response is directed;
- b. the name and contact information (including daytime telephone number) of the claimant and a description of the basis for the amount of the claim;
- c. the claim number(s) of the claim objection(s) to which the response is directed;

d. the specific factual basis and supporting legal argument upon which the party will rely in opposing the Claim Objection; and

e. any supporting documentation, to the extent it was not included with the proof of claim previously filed with the Clerk or Claims Agent, upon which the party will rely to support the basis for and amounts asserted in the proof of claim.

5. If you file a response to the Claim Objection, you should be prepared to argue that response at the Hearing unless you reach an agreement with the Debtors' counsel to continue or resolve your matter.

6. You need not respond to the Claim Objection or appear at the Hearing if you do not object to the relief requested in the Claim Objection. If you do not timely file and serve a response to the Claim Objection, the relief requested in the Claim Objection may be granted without further notice to you. Failure to timely file a response to the Claim Objection shall be deemed (i) waiver of your right to respond to the Claim Objection and (ii) your consent to the relief requested in the Claim Objection.

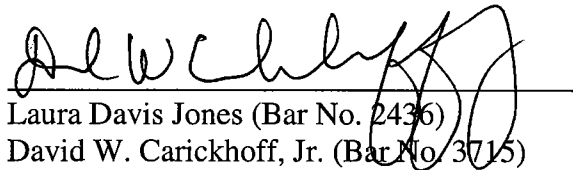
7. The Debtors reserve the right to file and serve a reply to a claimant's Response. If you have any questions regarding your claim you should contact Bankruptcy Management Corporation at (888) 909-0100. If you have any questions regarding the Claim Objection, please call Kirkland & Ellis LLP at (312) 861-2043.

Dated: February 11, 2005

KIRKLAND & ELLIS LLP  
James H.M. Sprayregen, P.C.  
James W. Kapp III  
Janet S. Baer  
200 East Randolph Drive  
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(312) 861-2000

and

PACHULSKI, STANG, ZIEHL, YOUNG, JONES  
& WEINTRAUB P.C.

A handwritten signature in dark ink, appearing to read "D. W. Carickhoff, Jr.", is written over a horizontal line.

Laura Davis Jones (Bar No. 2436)  
David W. Carickhoff, Jr. (Bar No. 3715)  
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Co-Counsel for Debtors and Debtors in Possession